

UNITED STATES DISTRICT COURT

for the

_____ District of _____

United States of America

v.

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ in the
_____ District of _____, the defendant(s) violated:*Code Section**Offense Description*

Knowingly and unlawfully import, from a place outside the United States, to wit; the United Mexican States, to a place in the United States, to wit; Laredo, Texas, a controlled substance listed under Schedule II of the Controlled Substance Act, to wit; approximately 4.6 kilograms of fentanyl.

Knowingly and unlawfully conspire to import, from a place outside the United States, to wit; the United Mexican States, to a place in the United States, to wit; Laredo, Texas, a controlled substance listed under Schedule II of the Controlled Substance Act, to wit; 4.6 kilograms of fentanyl.

This criminal complaint is based on these facts:

☐ Continued on the attached sheet.Submitted by reliable electronic
means per Fed.R.Crim.P. 4.1, Ryan Casey
sworn to and signature attested
telephonically on March 13, 2023,
at Laredo, Texas.

Complainant's signature

Christopher dos Santos
United States Magistrate Judge

ATTACHMENT A

- On March 10, 2023, United States Citizen, Monica Mata VASQUEZ, entered the United States via the Juarez-Lincoln International Bridge port of entry in Laredo, Texas, while driving a Pontiac sedan registered to her name, with no additional passengers. Mata VASQUEZ provided Customs and Border Protection (CBP) officers with a negative oral customs declaration. CBP officers subsequently referred VASQUEZ for a secondary inspection.
- During the x-ray inspection of the vehicle, anomalies were discovered in the battery of the vehicle. Upon further inspection of the vehicle's battery, CBP officers extracted 4 packages containing a substance that field-tested positive for fentanyl, with a total combined weight of 4.6 kilograms.
- Homeland Security Investigations (HSI) special agents (SA) were notified and responded to the incident. During a post-Miranda interview, VASQUEZ claimed ownership of the Pontiac. VASQUEZ stated she was the only driver or individual in possession of the vehicle, and that she did not have any mechanical work done, while in Mexico. VASQUEZ stated she last had her battery replaced approximately one and a half years ago in the United States.
- VASQUEZ stated her purpose of the trip was to deliver groceries and medicine to a relative in Mexico, and that she had been doing that almost weekly for over a year. Crossing history analysis revealed more than 40 weekly crossings for VASQUEZ in the last year.
- VASQUEZ stated she consistently updated 2 individuals with her location during her travel to Mexico. During the search of her cellular phone, SAs discovered a message thread between VASQUEZ and one of those individuals, where the individual provides VASQUEZ with addresses in Monterrey, and further instructions of when to meet with other individuals while in Mexico. Separate conversations within the same message thread over the course of several months, include numerous communications between the 2 individuals discussing the selection, purchase, and replacement of batteries, along with the exchange of numerous photos of batteries on different occasions. Additionally, VASQUEZ provided the individual with various photos of her approaching and exiting the international port of entry. These conversations coincided with the time frames of her travel to Mexico.